

REMARKS

The present reply is responsive to the Office Action dated November 25, 2005. Claims 1, 2, 5 and 6 have been amended. New claims 10-16 have been added. No new matter has been added by the amendments or new claims. Support for the amendments and new claims may be found, by way of example only, at specification paragraphs 0018-0028, 0044-0055 and 0060-0061, as well as in FIGS. 8-10. Claims 7-9 have been cancelled. Therefore, claims 1-6 and 10-16 are presented for consideration in view of the following remarks.

Claims 1-9 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,097,605 ("Klatt") in view of U.S. Patent No. 5,584,043 ("Burkart"). Applicant respectfully traverses the rejection.

Klatt "relates to a contacting unit for card-shaped support elements of electronic components with a housing comprising an insertion slot for the support elements (generally called cards) in which housing a printed circuit board is arranged which has contacting elements for the electronic components and is connected to a contact field." (Col. 1, ll. 7-12.) The housing can handle multiple cards at the same time in different arrangements. (See col. 2, ll. 34-40; see also FIGS. 1-3.) The printed circuit board provides electrical connection between the cards and the contact field. (See col. 4, ll. 43-61.)

Klatt is simply devoid of any teaching or suggestion of a controller in the main body unit as in claims 1, 2 and 5. Nonetheless, it is contended in the Office Action that such a controller is "necessarily provided." (See Office Action, numbered paragraph 2, pg. 3.) No explanation is provided as to why the Examiner believes that such a controller must be located in the main body unit. "The fact that a certain result or

characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic." (M.P.E.P. § 2112(IV), emphasis in original.) As quoted in this section of the M.P.E.P., "To establish inherency, the extrinsic evidence 'must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.'" *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999) (citations omitted). Therefore, applicant respectfully requests that the Examiner either provide such extrinsic evidence so that a response can be presented on the merits or acknowledge that *Klatt* is deficient in this regard.

Burkart includes a controller for magnetic interface 5 and a processor 6 as seen in FIG. 4a. (See col. 3, ll. 1-5.) Critically, only discloses attachment of a single card at a time. (See, e.g., col. 3, line 23 to col. 4, line 42.) As only one card is insertable into the frame, *Burkart's* interface and processor are only capable of handling that one card at a time. *Burkart* does not overcome the deficiencies of *Klatt* as it does not teach or otherwise suggest a controller for handling, for instance, "concurrently controlling data writing and reading to each of said integrated circuit chips assembled in said respective ones of said loading sections" as required by claims 1, 2 and 5. Furthermore, there is no motivation to incorporate the controller teachings of *Burkart* into *Klatt* and, even if it were possible to do so, which applicant does not believe is the case, it would still not result in the controller as claimed. The other art of record also does not overcome the deficiencies of these references.

Claim 6 has been amended to recite "an integrated circuit unit disposed in said main body unit, said integrated circuit unit comprising a copyright protection circuit unit ... wherein, when said integrated circuit chip is loaded in the adaptor device along with a separate memory device, said copyright protection circuit unit is operable to authenticate the separate memory device to protect copyrighted data stored on the separate memory device." Neither *Klatt* nor *Burkart*, either alone or in combination, teaches or otherwise suggests these limitations. The other art of record also does not overcome the deficiencies of these references.

Therefore, for at least these reasons, applicant respectfully requests reconsideration and allowance of independent claims 1, 2, 5 and 6. Claims 3-4 and 10-16 depend from claims 1, 2, 5 and 6 and contain all the limitations thereof as well as other limitations that are neither disclosed nor suggested by the art of record. Accordingly, applicant submits that the dependent claims are likewise patentable.

Claims 1-9 were also rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,457,647 ("*Kurihashi*"). Applicant respectfully traverses the rejection.

The invention of *Kurihashi* "relates to a data memory system utilizing an adaptor for connecting a memory card, which is detachably insertable in a memory card slot of for example a digital electronic still camera for exchanging information signals with said digital electronic still camera, with a computer such as a work station or a personal computer." (Col. 1, ll. 10-15.) Different media may be used with the equipment at different times. (See col. 2, ll. 58-60; see also FIG. 2.) As identified in the Office Action, *Kurihashi* includes a controller 3 "for controlling the memory medium by the driver of the drive storage element." (Col. 9, ll. 20-21.)

Critically, *Kurihashi* only teaches management of a single detachable device at a time. It does not teach or otherwise suggest a controller for handling, for instance, "concurrently controlling data writing and reading to each of said integrated circuit chips assembled in said respective ones of said loading sections" as required by claims 1, 2 and 5.

As discussed above, claim 6 now includes a copyright protection circuit unit. *Kurihashi* neither teaches nor otherwise suggests all of the limitations of claim 6, including the copyright protection circuit unit. The other art of record also does not overcome the deficiencies of these references.

Therefore, for at least these reasons, applicant respectfully requests reconsideration and allowance of independent claims 1, 2, 5 and 6. Claims 3-4 and 10-16 depend from claims 1, 2, 5 and 6 and contain all the limitations thereof as well as other limitations that are neither disclosed nor suggested by the art of record. Accordingly, applicant submits that the dependent claims are likewise patentable.

As it is believed that all of the rejections set forth in the Office Action have been fully met, favorable reconsideration and allowance are earnestly solicited.

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If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have. If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

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